

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ALBERT TALONE, D.O., CRAIG WAX,
D.O., RICHARD RENZA, D.O., and ROY
STOLLER, D.O., individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

THE AMERICAN OSTEOPATHIC
ASSOCIATION,

Defendant.

Civil Action No.: 1:16-cv-04644-NLH-JS

**JOINT MOTION FOR CERTIFICATION OF SETTLEMENT CLASS, PRELIMINARY
APPROVAL OF SETTLEMENT, AND APPROVAL OF CLASS NOTICE**

Plaintiffs Albert Talone, D.O., Craig Wax. D.O., Richard Renza, D.O., and Roy Stoller, D.O. (the “Plaintiffs” or “Class Representatives”) and defendant American Osteopathic Association (the “AOA” or “Defendant”), having reached an agreement to settle the above-captioned case, respectfully move this Court to preliminarily approve the proposed settlement among the parties (the “settlement”), certify a Settlement Class and Sub-Classes (as defined in the accompanying Joint Brief), appoint plaintiffs’ counsel as Lead Class Counsel, and authorize the issuance of Notice of Settlement (the “Notice”).

In support of this Joint Motion, the parties submit a Joint Brief in support, attached to this Motion as Exhibit A, the Certification of Seth A. Goldberg, Esq., attached to this Motion as Exhibit B, and a fully executed copy of the parties’ executed Settlement Agreement, attached to this Motion as Exhibit C. The proposed forms of the Notice, and a proposed Order granting the parties’

Joint Motion for preliminary approval of the settlement are attached to the Settlement Agreement as Exhibits 1-4.

Respectfully submitted,
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/s/ Seth A. Goldberg

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CERTIFICATION OF SERVICE

I, Seth A. Goldberg, hereby certify that on July 24, 2018, I caused a true and correct copy of the foregoing Joint Motion for Certification of Settlement Class, Preliminary Approval of Settlement, and Approval of Class Notice to be filed with the U.S. District Court for the District of New Jersey and served upon counsel of record and to all other parties listed below via the Court's ECF system.

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By: /s/ Seth A. Goldberg
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